

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI, LLC,

Plaintiff,

vs.

VERIZON COMMUNICATIONS INC., et al.,

Defendants.

Case No. 2:20-cv-00280-JRG

JOINT MOTION TO DISMISS

Pursuant to the Parties' confidential settlement agreement, Plaintiff KAIFI LLC ("Plaintiff") and Defendants Verizon Communications Inc.; Cellco Partnership d/b/a Verizon Wireless; Verizon Services Corp.; Verizon Enterprise Solutions, LLC; Verizon Business Global, LLC; Verizon Business Network Services, LLC; Verizon Corporate Services Group Inc.; Verizon Data Services, LLC; Verizon Media Inc.; and Verizon Online, LLC ("Defendants") hereby jointly move to dismiss with prejudice all of the Parties' respective claims and counterclaims asserted in this action in their entirety, with each Party to bear its own costs, expenses and attorneys' fees.

Wherefore, the Parties respectfully request that the Court enter the proposed order of dismissal with prejudice submitted with this motion.

DATED: January 18, 2022

Respectfully submitted,

/s/ Robert Christopher Bunt

Enoch H. Liang

Cal. Bar No. 212324 (admitted in E.D. Texas)

Prashanth Chennakesavan – Lead Attorney

Cal. Bar No. 284022 (admitted PHV)

LTL ATTORNEYS LLP

300 S. Grand Ave., 14th Fl.

Los Angeles, California 90071

Telephone: (213) 612-8900

Facsimile: (213) 612-3773

Email: enoch.liang@ltmlaw.com

Email: prashanth.chennakesavan@ltmlaw.com

Jason Sheasby

Cal. Bar No. 205455 (admitted PHV)

IRELL & MANELLA, LLP

1800 Avenue of the Stars, Suite 900

Los Angeles, CA 90067

Telephone: (310) 277-1010

Facsimile: (310) 203-7199

Email: jshneasby@irell.com

Robert Christopher Bunt

Texas Bar No. 00787165

PARKER, BUNT & AINSWORTH PC

100 E. Ferguson St., Suite 418

Tyler, Texas 75702

Telephone: (903) 531-3535

Email: rcbunt@pbatyler.com

Counsel for Plaintiff

KAIFI, LLC

/s/ Kevin P. Anderson (with permission)

Kevin P. Anderson

KPAnderson@duanemorris.com

DUANE MORRIS LLP

505 9th Street, N.W., Suite 1000

Washington, DC 20004-2166

Telephone: (202) 776 7851

Facsimile: (202) 478 2620

Alice E. Snedeker

AEsnedeker@duanemorris.com

Glenn D. Richeson

gdricheson@duanemorris.com

DUANE MORRIS LLP

1075 Peachtree Street, Suite 1700

Atlanta, Georgia 30309

Telephone: (404) 253.6900

Facsimile: (404) 253.6901

Deron R Dacus

ddacus@dacusfirm.com

THE DACUS FIRM, PC

821 ESE Loop 323, Suite 430

Tyler, TX 75701

Telephone: (903) 705.1117

Facsimile: (903) 581.2543

Counsel for Defendants Verizon Communications Inc.; Cellco Partnership d/b/a Verizon Wireless; Verizon Services Corp.; Verizon Enterprise Solutions, LLC; Verizon Business Global, LLC; Verizon Business Network Services, LLC; Verizon Corporate Services Group Inc.; Verizon Data Services, LLC; Verizon Media Inc.; and Verizon Online, LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), the undersigned met and conferred with opposing counsel and this motion is being filed as a joint motion.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT

CERTIFICATE OF SERVICE

Pursuant to Local Rule CV-5(a), the undersigned hereby certifies that the foregoing document was filed and served electronically on January 18, 2022 to all counsel of record.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT